

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JEFF TITUS, individually;

Case No. 1:23-cv-00997-HYJ-SJB

Plaintiff,

Honorable Hala Y. Jarbou

v

Magistrate Judge Sally J. Berens

MICHAEL WERKEMA, in his individual capacity;  
the Estate of MICHAEL BROWN;  
jointly and severally,

Defendants.

/

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**DEFENDANT'S MOTION TO COMPEL AND SHOW CAUSE**

**NOW COMES** Defendant, the Estate of Michael Brown, through its counsel, and requests this Court: (1) order Plaintiff's criminal defense team to produce all improperly withheld materials; (2) order Plaintiff to produce any related materials; and (3) allow Defendant's counsel to procure additional deposition testimony on these items, including continuing the depositions of Plaintiff and William Fette for the reasons stated in the attached Brief in Support. Prior to the filing of this Motion, the undersigned reached out to Plaintiff's counsel on January 31, 2025 to request concurrence for the relief requested herein. The issue was also openly discussed during Plaintiff's deposition. To date, concurrence has not been forthcoming.

Respectfully submitted,

ROSATI SCHULTZ JOPPICH &  
AMTSBUECHLER PC

/s/ Thomas D. Beindit  
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Dated: February 4, 2025

**Proof of Service**

I hereby certify that on February 4, 2025 I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record listed herein.

Respectfully submitted,

ROSATI SCHULTZ JOPPICH &  
AMTSBUECHLER PC



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